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Counsel –

Consistent with the parties’ meet and confer correspondence and discussions, we write with an ESI proposal for Request for Production (“RFP”) No. 8 in Plaintiffs’ Second Supplemental Combined Set of Interrogatories and Request for Production of Documents, dated June 1, 2023 (the “June 2023 Requests”) and RFP Nos. 38-41 in Plaintiffs’ Fourth Combined Set of Interrogatories and Request for Production of Documents, dated December 10, 2024 (the “December 2024 Requests”).

Proposed Custodians

NAME	AGENCY	TITLE
Banks, Steven	OLR	Assistant Commissioner (September 2011-September 2015), Associate Commissioner (September 2015-September 2018), First Deputy Commissioner & General Counsel (February 2019-January 2022)
Campion, Renee	OLR	Assistant Commissioner (October 2002-December 2009), Associate Commissioner (January 2010-June 2014), First Deputy Commissioner (July 2014-January 2019), Commissioner (February 2019-present)
Campese, Matthew	OLR	Assistant Commissioner (2000-2011), Assistant Commissioner (2020-2024)
Cassano, Salvatore	FDNY	Chief of Fire Operations (2003-2006), Chief of Operations (2006-2009), Fire Commissioner (2010-2014)
Linn, Robert	OLR	Commissioner (January 2014- February 2019)
McNally, Patrick	FDNY	Chief of Fire Operations (2006-2009)

NAME	AGENCY	TITLE
Nigro, Daniel	FDNY	Chief of Fire Operations (2001-2002); Commissioner (2014-2022)
Pollak, Daniel	OLR	Assistant Commissioner (November 2015-October 2018), Associate Commissioner (October 2018-February 2022), First Deputy Commissioner (February 2022-present)

The City will agree to collect custodian emails from within these time frames, to the extent it is reasonably available, and apply the search terms set forth below. Following a reasonable and diligent search, the City was unable to identify potentially relevant custodians in the Mayor's Office given the lapse of time and turnover in administration. The City is willing to agree that if it identifies Mayor's Office custodians through this ESI review, it will apply the same search terms agreed upon herein, assuming that the ESI is reasonably accessible and yields a reasonable and proportional amount of ESI for review.

Proposed Search Terms

RFP No. 8, June 2023 Requests:

“firefighter*” AND “disability pension benefit*” AND (legislation OR statut* OR amend*)

RFP No. 38, December 2024 Requests:

“Local Law 19” AND pay

“Local Law 19” AND salary

“Local Law 19” AND wages

“Local Law 19” AND benefits

“Local Law 19” AND parity

“Local Law 19” AND bargain*

“Local Law 19” AND negotiat*

“Local Law 19” AND union*

“Local Law 19” AND local*

“Local Law 19” AND uniform*

“Local Law 19” AND (bargaining OR pattern)

“Local Law 19” AND civilian

“Local Law 19” AND (EMS OR “emergency medical services” OR EMT* OR “emergency medical technician*” OR paramedic*)

RFP Nos. 39-41, December 2024 Requests

(EMS OR “emergency medical services” OR EMT* OR “emergency medical technician*” OR paramedic* OR uniform*) AND (“Mayor of the City of New York” OR “Mayor of City of N.Y.” OR “Mayor of New York”)

(EMS OR “emergency medical services” OR EMT OR “emergency medical technician*” OR paramedic* OR uniform*) AND (court OR appeal OR judge) AND “Local Law 19”

* * *

Please let us know by March 3, 2025 if you have any proposed revision to the custodians or search terms. If we do not hear from you by then, we will move forward with this ESI proposal.

Respectfully,

/s/ Lora Minicucci
Lora Minicucci
Assistant Corporation Counsel